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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 12, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

RE: CC Docket No.95-116

Dear Ms. Salas:

Enclosed please find an original and 4 copies of "WorldCom's Comments" plus a diskette of the above-referenced docket.

Sincerely,

Richard S. Whitt
Director, Federal Affairs

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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|--|---|----------------------|
| In the Matter of |) | |
| |) | |
| Telephone Number Portability Phase I Implementation |) | CC Docket No. 95-116 |
| |) | |
| BellSouth Corporation |) | NSD File No. L-98-27 |
| |) | |
| GTE Service Corporation |) | NSD File No. L-98-29 |
| |) | |
| Pacific Bell |) | NSD File No. L-98-31 |
| |) | |
| US West Communications, Inc. |) | NSD File No. L-98-32 |
| |) | |

COMMENTS OF WORLDCOM, INC.

WorldCom, Inc. ("WorldCom") hereby files its comments concerning the petitions for extension of time filed in the above-referenced proceeding by BellSouth Corporation ("BellSouth"), GTE Service Corporation ("GTE"), Pacific Bell (Pacific Bell"), and US West Communications, Inc. ("US West").

I. INTRODUCTION AND BACKGROUND

WorldCom, Inc., through its wholly-owned subsidiaries WorldCom Technologies, Inc., MFS Telecom, Inc., Brooks Fiber Properties, Inc., WorldCom Network Services (d/b/a WilTel Network Services), and UUNET Technologies, Inc., provides its business and residential customers with a full range of facilities-based and fully integrated local, long distance, and international telecommunications services, and information services. In particular, WorldCom is one of the world's leading facilities-based interexchange carriers ("IXCs") and competitive local exchange carriers ("CLECs").

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Thirteen carriers -- including WorldCom -- have filed petitions asking the Commission to grant an extension of time to meet the LNP Phase I implementation schedule for local number portability ("LNP"). This extension is necessary for the proper implementation of LNP in the former "Perot Systems" areas of the country (the Southeast, West Coast, and Western regions). The carriers have asked for delays of various periods of time for LNP implementation in those areas.

The petitioning carriers indicate that the primary reason for an extension of time is the failure of Perot Systems as the number portability administration center ("NPAC") vendor to provide a stable system for LNP. Lockheed Martin IMS ("Lockheed") has since been contracted with to provide a functioning NPAC system. The live date for the Lockheed system is widely agreed to be May 11. Once the NPAC goes live, carriers must undertake inter-company testing, which may last up to 30 days. While carriers point to a common cause necessitating the extension of time, however, they diverge widely on how much of a delay is needed, and how the additional time allowed should be apportioned.

II. THE ILECS' PETITIONS FAIL TO DEMONSTRATE ADEQUATE SUPPORT FOR THEIR PROPOSED SIGNIFICANT DELAYS IN THE LNP PHASE I IMPLEMENTATION SCHEDULE

At the outset, WorldCom notes that, while the consensus may well be that the NPAC live date will be May 11, it is also very possible that the live date may be earlier. WorldCom asks the Commission to keep this fact in mind when granting delays and to require

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carriers to adjust their schedules accordingly and conclude testing and other activities so as not to delay unnecessarily LNP implementation.

In particular, WorldCom is concerned about the delays sought by BellSouth (NSD File No. L-98-27), Pacific Bell (NSD File No. 98-31), US West (NSD File No. L-98-32), and GTE (NSD File No. 98-29). WorldCom's comments will address those petitions in turn.

BellSouth Corporation

In BellSouth's region, Atlanta is the first metropolitan statistical area ("MSA") in which LNP is to be implemented in Phase 1. BellSouth claims that extensive delays are required in all 5 phases because of engineering specifications that must be undertaken to satisfy the new NPAC system. According to BellSouth, its LNP operations systems were geared to Perot's system, which had software known as specification release 1.1 ("NANC 1.1"). LM's NPAC, however, has progressed further and, in accordance with industry group specifications, has installed another version ("NANC 1.8"). BellSouth claims it needs an additional 16 weeks beyond the current projected NPAC delivery date to perform this work.¹ Then, after certification with the NPAC, BellSouth can begin intercompany testing with other carriers September 1, needing a full 30 days for that activity.

WorldCom opposes BellSouth's proposed lengthy delays. In effect, BellSouth is

¹ BellSouth Petition at 2.

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buying time to keep its customers under the guise of having to play catch-up to the new vendor. WorldCom does not disagree that Perot's system was using NANC 1.1. However, BellSouth, as a listed member of the LNPA Work Group of the North American Numbering Council ("NANC") whose subgroup, the Technical & Operations Task Force, developed NANC 1.8, has had the opportunity to know, and the responsibility to undertake, whatever was needed to support NANC 1.8. Interestingly, neither Pacific Bell nor US West make this argument, even though both RBOCs have dealt with Perot and face the very same discrepancy.

BellSouth states further that after February 10, when the contract with Perot was terminated, it began discussions with LM to analyze the specifications. When discussions concluded on February 20th, "it was determined that Lockheed Martin has built its NPAC SMS to NANC specification 1.8, a full seven software releases beyond the functionality of the Southeast Region's previous LNPA and beyond the functionality of the BellSouth LNP Gateway LSMS and the BellSouth AIN SMS."²

The fact that BellSouth apparently waited until the last possible moment to investigate the situation should not be cause to retard local service competition. BellSouth knew, just as many other carriers knew, back in October 1997 that serious problems existed with Perot. BellSouth also knew that Perot missed its crucial Dec. 15 deadline. Nonetheless, BellSouth now is saying that from December 15 until February 10, it took no forward-looking action. Informal

² BellSouth Petition at 13.

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private discussions among and between carriers, as well as formal discussions at the limited liability company ("LLC") level, were held frequently to analyze options, review problems and consider alternatives. There was only one alternative if the contract with Perot was to be terminated -- Lockheed. BellSouth had the right and the responsibility to actively pursue information and knowledge regarding its ongoing efforts.

Even though BellSouth demands more time, "BellSouth is not in a position to complete its reengineering to the specifications of the new LNPA's database until after the June 30, 1998 deadline for implementing Phase III MSAs." BellSouth does not, however, explain why it cannot move any faster than that. It is incumbent on BellSouth to comply as quickly as possible, so as not to unduly delay competition.

WorldCom believes that BellSouth also is employing the RBOCs' favorite "network reliability" bogeyman to try to thwart competition. BellSouth declaims:

it is neither technically feasible nor prudent from a network reliability standpoint, to attempt to implement all 21 MSAs in the Southeast Region in a all five Phases in a 90 day region wide 'flashcut' in order to meet the Commission's current December 31, 1998 deadline for Phase V MSAs.³

BellSouth needs to back up that bald claim with facts, not rhetoric. In no way does WorldCom make light of network reliability. However, the ILECs too many times have employed that issue to suit their own needs. LNP implementation is not the threat to network safety that it is

³ BellSouth Petition at 14.

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portrayed to be.

BellSouth has 21 MSAs within the region in which LNP shall become a reality.⁴ WorldCom reminds BellSouth that the deadline is the end date, not the start date for LNP implementation. There is no good reason why BellSouth cannot stagger the MSAs, for example by adding Miami, Orlando, and Tampa to "Phase 1." BellSouth can certainly take the initiative to reorder the MSAs, with some moved to earlier phases to even out the schedule. It is unclear why BellSouth cannot deploy LNP in four MSAs in Phase 1 and five in each remaining MSA, and work on both Baton Rouge and New Orleans in "Phase 3" WorldCom is confident that communities or areas of interest can be discerned among the 21 MSAs for an orderly, efficient, and vastly more timely implementation effort. This type of realignment would also well serve competition. When only a handful of switches is LNP-capable, economies of scale for sales, marketing, and service purposes cannot be realized.

Thus, WorldCom urges the Commission to ignore BellSouth's arguments that timely LNP deployment in its MSAs somehow would cause the telephone network to fail. WorldCom also urges that the RBOCs generally be directed to come up with timely solutions for problems, or else substantiate in detail why such lengthy delays are appropriate.

⁴ BellSouth Petition at 21.

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Pacific Bell

Pacific Bell asks for a Phase 1 delay from March 31 to July 19; Phase 2 from May 15 to August 18, Phase 3 from June 30 to September 17 and Phase 4 from September 30 to October 19. In Pacific Bell's territory of California, Los Angeles is the MSA in which LNP is to be implemented in Phase 1; Riverside and San Diego in Phase 2, Orange County, Oakland, and San Francisco in Phase 3; San Jose, Sacramento and Fresno in Phase 4 and Ventura, Bakersfield, Stockton and Vallejo in Phase 5.

In its lengthy waiver filing, Pacific Bell shares little substance as to why the long delay is necessary. Pacific Bell agrees with the industry consensus that only 30 days are needed for industry testing.⁵ Further, the RBOC states that it can start porting one work day after the conclusion of intercompany testing. If the NPAC is live May 11 (and not earlier) testing should be scheduled to begin that day or no later than May 12. Approximately 30 days from that date is June 10, when porting should begin. It is not clear why, after so much additional time, the ILECs in the affected regions cannot cut over all switches rather than prolong the delay through a phased-in approach.

Pacific Bell offers no evidence why Phases 2, 3, and 4 must also be delayed so dramatically. Obviously, Phase 2 will be affected if the NPAC is "delivered" May 11, four days before the Phase 2 end date of May 15. But Pacific Bell does not show why it proposes

⁵ Pacific Bell Petition at 19.

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a July 20 start date, instead of turning up both Phase 2 and Phase 1 around June 11. Further, Phase 3 could very well be turned up with Phases 1 and 2, for the end date of all phases is the deadline for, not the "due date" of LNP implementation. The "due date" of LNP implementation is the first day of the respective phase.

WorldCom sees no good reason for Pacific Bell to string along the process any more than the industry has already been by its vendor. Neither Pacific Bell nor any other ILEC should be allowed to dawdle, further compounding the delay.

US West

WorldCom opposes the unnecessarily drawn-out schedule proposed by US West. According to the RBOC, there are unique situations among its operating companies so that additional time is needed for each system to be tested individually with the NPAC. WorldCom does not oppose such testing, but does oppose the proposed drawn-out method.

US West states that it cannot undertake simultaneous interoperability testing because such testing requires specialized skills. US West claims it only has a limited number of personnel with the expertise needed to conduct these tests, so they can only take place consecutively, not concurrently. However, this appears to be only a management decision regarding allocation of resources and personnel for strategic advantage. There is no good reason why competitors should be denied access to the local market because the incumbent has failed to staff properly to undertake congressional and regulatory mandates that have been known for

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years. WorldCom also is puzzled why US West did not file a waiver on January 28 detailing this US West-specific problem. US West should be able to assign other capable people to be trained for the appropriate testing.

Further, if the NPAC is ready for intercompany testing May 11, which takes about 30 days, US West need not pluck the date of July 17 as a Phase 1 LNP completion date. Similarly, in Phase 2, the MSA of Phoenix, AZ and Seattle, WA come on line, and US West declares it needs a 3-month extension for LNP implementation completion to August 14. WorldCom cannot fathom why US West cannot locate capable staff to assign these responsibilities in order to reduce the time needed. Even if each operating company system needs to be tested with the NPAC, it is likely that each system need not be tested time and time again for every new MSA in every phase.

WorldCom asks the Commission to direct US West to conduct such testing it needs concurrently and to do whatever is necessary to enable appropriate personnel to handle LNP implementation speedily and effectively. WorldCom is confident that, upon closer examination, US West can indeed shrink the delay it seeks to impose on consumers and competitors in its markets.

GTE

GTE has seized upon the delays caused by Perot and its subsequent ejection as NPAC vendor to fashion a powerful marketing tool of its own. GTE, while disregarding its own

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testing and other activities concerning Lockheed as the NPAC vendor in the mid-Atlantic region and other regions -- as well as its own testing with several national CLECs -- portrays itself as a carrier that must undergo the most rigorous LNP implementation, and therefore warranting an exaggerated deployment schedule. WorldCom wonders why the knowledge and experience GTE has gained in other parts of the country cannot be used effectively when ensuring that its network and operating systems work with the NPAC.

Once GTE tests its system with the respective RBOC/ILEC in the Southeast, West Coast, and Western regions, and with first-time CLECs, no Perot-related problem exist that can warrant the realignment of the phases to remove overlapping MSA implementation.⁶ Many problems should be laid at Perot's door, but GTE's strategy stems from competitive self-interest, not vendor failure.

Further, GTE apparently is building a "rest period" into its delays. GTE wants to begin Phase 2 about October 2, but with no less than 50 days between the completion of Phase 1 and the next implementation phase. There is no justification for the additional 2-month delay. GTE wants 30-day respites from LNP implementation between subsequent Phases 2, 3, and 4. WorldCom urges the Commission to declare that it is GTE's responsibility to implement LNP in an expeditious fashion, and that no ILEC can hide behind Perot-caused delays.

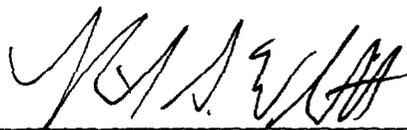
⁶ GTE Petition at 9.

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III. CONCLUSION

For the reasons given, the Commission should not grant the excessive additional time sought by BellSouth, Pacific Bell, US West, and GTE.

Respectfully submitted,



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March 12, 1998

CERTIFICATE OF SERVICE

I, Cecelia Johnson, hereby certify that I have this 12th day of March, 1998, sent a copy of the foregoing "Comments of WorldCom, Inc." by hand delivery to the following:

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